

# BOGLE & GATES

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May 25, 1988

Mr. Charles E. Findley  
Director, Hazardous Waste Division  
U.S. Environmental Protection Agency  
Region X  
1200 Sixth Avenue  
Seattle, WA 98101

Re: Lockheed Shipbuilding Co. -  
Harbor Island Superfund

Dear Mr. Findley:

On May 17, 1988, representatives of Lockheed Shipbuilding Co. ("Lockheed") met with Lori Cohen and Deborah Gates of the U.S. Environmental Protection Agency ("EPA") with regard to Lockheed's property on Harbor Island. At that meeting, Lockheed proposed to conduct a full characterization of its site and requested that EPA evaluate the proposed work plan, concur in it, and at the completion of any soil remediation required, certify that the soil is clean.

As outlined at the meeting, Lockheed proposes to do the following:

- Review past use of chemicals on the site;
- Define current soil and groundwater conditions;
- Conduct a full-site survey;
- Interview former employees;
- Review historical records;
- Review historic aerial photography;
- Conduct a marine sediment sampling program for heavy metals;

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- Identify any sources of PCBs or asbestos;
- Sample all storm drain outfalls;
- Remove all underground storage tanks and test soil;  
and
- At the conclusion of the study, remediate all surface  
contamination.

Lockheed would consider undertaking this work pursuant to an Administrative Consent Order, depending on the terms of that Order and the extent of EPA's participation. Lockheed recognizes that such an oversight role would require EPA to incur certain costs and understands that Lockheed may have an obligation to reimburse EPA for reasonable oversight costs. In addition, Lockheed would need to be assured that the costs it incurs in performing the characterization and remediation would be fully offset against any Harbor Island Superfund remedial expenses which might be charged against the company in the future.

Please let us know if you have any questions on this proposal. We look forward to your response.

Very truly yours,

BOGLE & GATES

  
Charles R. Blumenfeld

✓ cc: Ms. Lori Cohen  
Mr. Fred H. Reed

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